

Robert Hamparyan (State Bar No. 181934)
HAMPARYAN INJURY LAWYERS, APC
275 W. Market Street
San Diego, CA 92101
t. 619.550.1355
e. robert@hamparyanlawfirm.com

John J. O'Brien (State Bar No. 253392)
THE O'BRIEN LAW FIRM, APLC
750 B Street, Suite 3300
San Diego, CA 92101
t. 619.535.5151
e. john@theobrienlawfirm.com

Brian M. Holm (State Bar No. 255691)
HOLM LAW GROUP, PC
12636 High Bluff Drive, Suite 400
San Diego, CA 92130
t. 858.707.5858
e. brian@holmlawgroup.com

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

JANE DOE NOS. 1 - 22, inclusive, individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business organization, form unknown; MICHAEL J. PRATT, an individual; ANDRE GARCIA, an individual; MATTHEW WOLFE, an individual; BLL MEDIA, INC., a California corporation; BLL MEDIA HOLDINGS, LLC, a Nevada limited liability company; DOMI PUBLICATIONS, LLC, a Nevada limited liability company; EG PUBLICATIONS, INC., a California corporation; M1M MEDIA, LLC, a California limited liability company; BUBBLEGUM FILMS, INC., a business organization, form unknown; OH WELL MEDIA LIMITED, a business organization, form unknown; MERRO MEDIA, INC., a California corporation; MERRO MEDIA HOLDINGS, LLC, a Nevada limited liability company; and ROES 1 - 550, inclusive,

Defendants.

LEAD CASE:

Case No.: 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:

Case No.: 37-2017-00033321-CU-FR-CTL

Case No.: 37-2017-00043712-CU-FR-CTL

DECLARATION OF PLAINTIFF JANE DOE NO. 13 IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT DOMI PUBLICATION LLC'S SPECIAL MOTION TO STRIKE [CCP §425.16]

Date: August 31, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Location: C-73

DECLARATION OF JANE DOE NO. 13

I, Jane Doe No. 13, declare as follows:

1. I am a plaintiff in the above-captioned action. I have personal knowledge of each fact stated in this declaration.

2. In November 2015, Defendants posted an advertisement on Craigslist.com in the gigs/modeling section, seeking young women for adult modeling. I responded to the advertisement and corresponded with defendant Andre Garcia ("GARCIA") and defendants' videographer going by "Ted." Our initial conversions were via text and/or email -- the following representations regarding distribution were conveniently by phone or in-person.

3. Defendants told me that they would not post the subject video online and they would not distribute the videos in the United States. They told me the video was going to Australia - and would only be in DVD format. They had me speak with another woman, who assured me the videos do not get leaked.

4. Before the shoot, GARCIA and "Ted," again, assured me they would not post the video online and they would not distribute the video in the United States. They assured her there was nothing to worry about, promised me privacy, and represented nobody I knew would see the videos.

5. GARCIA and "Ted" continued to make the above representations before and simultaneous with providing me documents to sign. They told me the documents were merely summing up all we had previously talked about.

6. After the video shoot, Defendants did not pay me in full, as they represented.

7. In January 2016, Defendants released my video on their website, www.girlsdoporn.com, and other websites, which were then discovered by my family, friends, and school.

8. As a result of the release of the video, I have suffered emotional distress damages (including loss of eating, loss of sleep, enduring fright, shock, nervousness, anxiety, depression, embarrassment, mortification, shame, and fear):

a. I debated suicide.

1 b. I debated leaving the country.

2 c. I had to drop out of my sorority due to the backlash of students and friends.

3 d. Strangers have stalked me online, often sending me links, pictures, and making horrible
4 comments.

5 9. I would never have agreed to the video, if Defendants had been truthful, told me their plan to
6 release my video on their website, or told me I was in danger. I would never have agreed to the video,
7 if Defendants had told me their website existed. I made a mistake trusting the Defendants – they are
8 not truthful people.

9 10. Before and during this lawsuit, I made changes to my life to minimize the harassment and other
10 damages the Defendants have caused me. In this lawsuit, I seek the Court's help in remedying the
11 damages the Defendants have caused me. Unsealing the Court record will likely cause me even more
12 harm and the harassment may exacerbate and/or resurface. Unsealing the Court record will worsen the
13 very harm I have am seeking to now remedy.

14
15 I declare under penalty of perjury under the laws of the State of California that the foregoing is
16 true and correct.

17
18 Date: March 7, 2017

By: Jane Doe No. 13
Jane Doe No. 13